

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEWJERSEY**

IN RE:	§	CHAPTER 11
	§	
BLOCKFI., <i>et al.</i> ,	§	CASE NO. 22-19361 (MBK)
Debtors.	§	
	§	
	§	

**RESPONSE OF INDIVIDUAL CLAIMANTS TO
DEBTORS' SEVENTEENTH OMNIBUS OBJECTION**

Daniel J. Thornburgh, Esq., as counsel to certain Creditors identified herein, hereby submits this statement in response (the “Response”) to the *Debtors’ Seventeenth Omnibus Objection to Claims* (the “Omnibus Objection”)¹, and states as follows:

1. Daniel J. Thornburgh, Esq. is counsel to certain Creditors to which the Debtors have objected in the Omnibus Objections. The below Creditors dispute the Debtors’ objections to the following Interest Bearing Account (“BIA”) claims:

12929	14127
14357/14232	15016
31535/12280	12687
1158/12301	12658

2. On March 2, 2023, Creditors’ counsel timely served a Proof of Claim (“POC”) form on behalf of Claimant #12929, in the amount of \$28,873.52. Attached to the Proof of Claim form was an Exhibit showing the value within Creditor’s BIA at the time of the Debtor’s Petition for Bankruptcy. See attached hereto as Exhibit “A”. However, it appears that a standard Proof of Claim was also filed (see Claim#511) in the amount of \$29,667.00 concerning the same

¹ Docket Entry (“DE”) 2169.

cryptocurrency held within his Interest Bearing Account. If correct, and as long as Claim #511 survives in an amount equal to the submitted claim and/or supporting documents, then Claimant does not oppose the objection.

3. On March 29, 2023, Creditors' counsel timely served a Proof of Claim form on behalf of Claimant #14232, in the amount of \$9,705.66. Attached to the Proof of Claim form was an Exhibit showing the value within Creditor's BIA at the time of the Debtor's Petition for Bankruptcy was \$9,705.66. See attached hereto as Exhibit "B". It appears that the Creditor may have submitted two claim forms (see claim#14357) for the same BIA account. To the extent this is correct, and claim# 14232 in the amount of \$9,705.66 survives, Creditor does not oppose the Debtor's objection and requested action.

4. On March 17, 2023, Creditors' counsel timely served a Proof of Claim form on behalf of Claimant #12280, in the amount of \$41,482.89. Attached to the Proof of Claim form was an Exhibit showing the value within Creditor's BIA at the time of the Debtor's Petition for Bankruptcy was \$41,482.89. See attached hereto as Exhibit "C". It appears that the Creditor may have mistakenly submitted another BIA claim for \$0.00 (see claim#14357). To the extent claim 12280 in the amount of \$41.482.89 survives, Creditor does not oppose the Debtor's objection and requested action.

On March 17, 2023, Creditors' counsel timely served a Proof of Claim form on behalf of Claimant #12301, in the amount of \$27,208.63. Attached to the Proof of Claim form was an Exhibit showing the value within Creditor's BIA at the time of the Debtor's Petition for Bankruptcy was \$27,208.63 (USD). See attached hereto as Exhibit "D".

It appears that the Creditor may have mistakenly submitted a standard claim for \$28,836.46 (see claim#1158) concerning the same cryptocurrency held within his BIA account, likely based

on the value of that cryptocurrency at the time claim #1158 was filed. To the extent claim #12301 in the amount of \$27,208.63 survives, Creditor does not oppose the Debtor's objection and requested action.

5. On March 28, 2023, Creditors' counsel timely served a Proof of Claim form on behalf of Claimant #14127, in the amount of \$12,270.64. Attached to the Proof of Claim form was an Exhibit showing the value within Creditor's BIA at the time of the Debtor's Petition for Bankruptcy was \$12,270.64. See attached hereto as Exhibit "E". The creditor does not understand why the Debtor's records show an asserted claim of \$0.00 and can only assume, without more information, that this was a data entry error on the part of the Debtor. Thus, Creditor opposes Debtor's objection and its requested action to "expunge" his valid claim, which is contradicted by the attached evidence.

6. On March 31, 2023, Creditors' counsel timely served a Proof of Claim form on behalf of Claimant #15016, in the amount of \$28,719.72. The Creditor attached his BlockFi statement dated August 7, 2021 to his Proof of Claim form See attached hereto as Exhibit "F". The Creditor's records show a very different value than the Debtor's records. While Claimant was injured and has suffered from some memory loss as a result, he has no documentation showing that he withdrew this amount prior to the bankruptcy petition. Plaintiff has been unable to access his BlockFi account, despite multiple attempts. As such, without more information, the Creditor opposes the Debtor's objection and its requested action to modify the POC value to \$16.29 (USD).

7. On March 20, 2023, Creditors' counsel timely served a Proof of Claim form on behalf of Claimant #12687, in the amount of \$17,098.60. Attached to the Proof of Claim form was an Exhibit showing the value within Creditor's BIA at the time of the Debtor's Petition for Bankruptcy was \$17,098.60. See attached hereto Composite Exhibit "G". Claimant also submitted

a wallet claim in the amount of \$13.70. The creditor does not understand why the Debtor's records show an asserted claim of \$13.70. Ex. G. Thus, Creditor opposes Debtor's objection and its requested action to "expunge" his valid claim, which is contradicted by the attached evidence.

8. On March 20, 2023, Creditors' counsel timely served a Proof of Claim form on behalf of Claimant #12658, in the amount of \$295,583.81. See attached hereto as Exhibit "H". To the extent claim # 12658 survives in the amount of \$295,583.81, Claimant does not oppose the objection.

Dated: April 1, 2024.

Respectfully submitted,

/s/ Daniel J. Thornburgh

Daniel J. Thornburgh (*pro hac vice*)

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CERTIFICATE OF SERVICE

I, Daniel J. Thornburgh, do hereby certify that I have this date transmitted this Electronic Case Filing as it appears on this date in the Court registered e-filers of CMECF, a true and correct copy of the above and foregoing Response of Individual Claimants to Debtors' Omnibus Objections, dated April 2, 2024, to the below parties:

Service Provided via Notice of Electronic Filing (NEF) through ECF system:

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